## IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE: Chapter 11

BAY CIRCLE PROPERTIES, LLC, et al., Case No

Debtors.

Case No.: 15-58440-wlh (Jointly Administered)

## RENEWED RESPONSE TO UNITED STATES TRUSTEE'S MOTION TO CONVERT OR DISMISS

SEG Gateway, LLC and Good Gateway, LLC (collectively, "Gateway") renew their Response to United States Trustee's Motion to Convert or Dismiss [doc. 796], and Notice Rescheduling Hearing [doc. 835], and incorporates by reference their initial response [doc. 807], filed November 27, 2017.

Respectfully submitted, this 3rd day of May, 2018.

/s/ Walter E. Jones

Walter E. Jones Georgia Bar Number 163287

Attorney for Good Gateway, LLC and SEG Gateway, LLC

## **Balch & Bingham LLP**

30 Ivan Allen Jr. Boulevard, N.W. Suite 700

Atlanta, Georgia 30308 Telephone: (404) 261-6020 Facsimile: (404) 261-3656

wjones@balch.com

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 3, 2017, I electronically filed the foregoing *Renewed Response to United States Trustee's Motion to Convert or Dismiss* with the Clerk of the Court by using the Court's CM/ECF system, which will provide automatic notice to all counsel of record.

/s/ Walter E. Jones

Walter E. Jones Georgia Bar Number 163287

255883.1